

# **EXHIBIT 8**

MrEricGoodwin\_Rough

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REALTIME AND INTERACTIVE REALTIME

3

TRANSCRIPT

ROUGH DRAFT DISCLAIMER

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with the final transcript upon its  
completion.

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Case: NAACP VS. ERCSD

15

Date: FEBRUARY 8, 2018

REPORTER'S NOTE:

16

Since this deposition has been realtimed  
and is in rough draft form, please be  
aware that there may be a discrepancy  
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Also please be aware that the realtime  
screen and the noncertified rough draft  
transcript may contain untranslated steno,  
reporter's note in double parentheses,

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21

MrEricGoodwin\_Rough  
misspelled proper names, incorrect or  
22 missing Q/A symbols or punctuation, and/or  
nonsensical English word combinations.  
23 All such entries will be correct on the  
final, certified transcript.  
24 Court Reporter's Name:THERESA TRAMONDO  
FIRM: VERITEXT LEGAL SOLUTIONS  
25

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1  
2 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
3 ----- X  
NATIONAL ASSOCIATION FOR  
4 THE ADVANCEMENT OF  
COLORED PEOPLE,  
5 SPRING VALLEY BRANCH, et al.,  
6 Plaintiffs,  
7 vs. No.  
7:17-cv-08943  
8 EAST RAMAPO CENTRAL  
9 SCHOOL DISTRICT, et al.,  
10 Defendants.  
----- X  
11

12 Month Date, 2018  
13 Time ^ a.m. ^ p.m.  
14  
15

16 Deposition of WITNESS NAME, held  
17 at the offices of Firm, Address, City,

MrEricGoodwin\_Rough

18 State, pursuant to Replace, before Theresa  
19 Tramondo, AOS, CLR, a Notary Public of the  
20 State of New York.  
21  
22  
23 Reported by:  
24 THERESA TRAMONDO, AOS, CLR  
25 JOB NO. ^ ^

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1  
2 APPEARANCE OF COUNSEL:  
3 FOR PLAINTIFF:  
4 [!FIRM1]  
5 [!ADDRESS-A1]  
6 [!CITY1], [!STATE1] [!ZIP1]  
7 BY: [!ATTORNEY1]  
8 [!E-MAIL1]  
9 [!PHONE NUMBER1]  
10 FOR ^ PLAINTIFF ^ DEFENDANT:  
11 [!FIRM2]  
12 [!ADDRESS-A2]  
13 [!CITY2], [!STATE2] [!ZIP2]

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14 BY: [!ATTORNEY2]  
15 [!E-MAIL2]  
16 [!PHONE NUMBER2]  
17 FOR ^ PLAINTIFF ^ DEFENDANT:  
18 [!FIRM3]  
19 [!ADDRESS-A3]  
20 [!CITY3], [!STATE3] [!ZIP3]  
21 BY: [!ATTORNEY3]  
22 [!E-MAIL3]  
23 [!PHONE NUMBER3]  
24  
25

4

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2 APPEARANCE OF COUNSEL (cont'd):  
3  
4 FOR ^ PLAINTIFF ^ DEFENDANT:  
5 [!FIRM4]  
6 [!ADDRESS-A4]  
7 [!CITY4], [!STATE4] [!ZIP4]  
8 BY: [!ATTORNEY4]  
9 [!E-MAIL4]

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10

11 FOR ^ PLAINTIFF ^ DEFENDANT:

12 [!FIRM5]

13 [!ADDRESS-A5]

14 [!CITY5], [!STATE5] [!ZIP5]

15 BY: [!ATTORNEY5]

16 [!E-MAIL5]

17 [!PHONE NUMBER5]

18 ALSO PRESENT:

19 NAME

20 NAME

21

22

23

24

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STIPULATIONS

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IT IS HEREBY STIPULATED AND AGREED,

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6 by and among counsel for the respective  
7 parties hereto, that the filing,  
8 sealing and certification of the within  
9 deposition shall be and the same are  
10 hereby waived;

11 IT IS FURTHER STIPULATED AND AGREED  
12 that all objections, except as to form  
13 of the question, shall be reserved to  
14 the time of the trial;

15 IT IS FURTHER STIPULATED AND AGREED  
16 that the within deposition may be signed  
17 before any Notary Public with the same  
18 force and effect as if signed and sworn to  
19 before the Court.

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2 BY THE COURT REPORTER:

3 Q. Please state your full name for  
4 the record.

5 A. Eric Goodwin.

6 Q. What is your address?

7 A. Home, 87 Meadow Lane, Nanuet New  
8 10954.

9 EXAMINATION BY ^ HEADERS

10 MR. LEVINE:

11 Q. Good morning, Mr. Goodwin.

12 A. Good morning.

13 Q. My name is Randall Levine. I'm  
14 attorney for the East Ramapo Central School  
15 District.

16 A. Yes.

17 Q. Do you understand you're here  
18 today to give testimony in a case called  
19 NAACP versus East Ramapo Central School  
20 District?

21 A. Yes, I do.

22 Q. Have you ever been deposed  
23 before?

24 A. No, I haven't.

25 Q. Well, we'll go over a few of the



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2 ground rules. If you have any questions,  
3 please ask.

4 Are you represented by counsel?

5 A. Yes, I am.

6 Q. Is your counsel sitting right  
7 next to you?

8 A. Yes, they are.

9 Q. Very good.

10 In a deposition I'm going to ask  
11 you a series of questions and your job is to  
12 answer each question as fully and honestly  
13 as you can to the very best of your  
14 recollection do you understand?

15 A. I understand.

16 Q. As you can see the conversation  
17 we're going to have is going to be  
18 transcribed that requires a few things from  
19 us. First it makes things much easier if we  
20 don't speak over each other so I will ask  
21 you a question if you ask for me to wait

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22 until I finish my question before you answer  
23 it makes the transcript read a lot easier do  
24 you understand?  
25 A. I understand.

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2 Q. Another thing the transcript  
3 does not pick up head shakes or shoulder  
4 shrugs, so if I ask you a question, I need  
5 you to answer verbally do you understand?  
6 A. I understand.  
7 Q. If you need to take a break at  
8 any time during the deposition, that's fine,  
9 please ask. All I ask in return if I asked  
10 you a question, just answer the question  
11 first, then we will take the break. Okay?  
12 A. Understand.  
13 Q. At certain points today your  
14 counsel may object to one of my questions,  
15 if that happens, it's not an instruction to  
16 you not to answer the question, so if you  
17 understand you should answer anyway. Okay?

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18 A. I understand.

19 Q. If at any point you decide you  
20 want to talk to your counselor about  
21 something just ask for a break, we can do  
22 that.

23 A. I understand.

24 Q. Before we move on, do you have  
25 any questions for me about how this will

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2 work?

3 A. No questions at this time.

4 Q. Is there any reason you can  
5 think of today why you wouldn't be able to  
6 give full, complete and honest testimony  
7 today?

8 A. There is no reason.

9 Q. Are you feeling healthy today?

10 A. Yes, I do.

11 Q. Have you taken any medication  
12 this morning that may affect your memory?

13 A. No I did not.

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14 Q. Did you do anything to prepare  
15 for your deposition this morning?

16 A. Outside of me with my counsel's  
17 no.

18 Q. Okay. I'm not interested in  
19 anything that you may have discussed with  
20 your counsel please don't tell me anything  
21 about that.

22 Did you review any documents to  
23 prepare for your deposition this morning.

24 A. No.

25 Q. Did you meet with your counsel

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2 again without telling me anything about what  
3 was discussed did you meet with your counsel  
4 to prepare for the deposition this morning?

5 A. I met with my counselor this  
6 morning to make sure that I was on time.

7 MS. PARVIS: Objection. Make  
8 sure you don't go into anything that  
9 we discussed.

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10 A. Just make sure I was on time and  
11 ready game ready for today' events.

12 Q. Did you meet with your counsel  
13 at any time prior to this morning to prepare  
14 for the deposition?

15 A. Yes, I did.

16 Q. When did you meet with your  
17 counsel to prepare for the deposition?

18 A. Last week, a few days last week.

19 Q. Do you remember what days?

20 A. I think it was about three days  
21 last week, Monday, Wednesday and Thursday.

22 Q. Was anybody else there during  
23 those meetings besides your counsel?

24 A. When you speak of anyone I mean  
25 it was in the M L K center so there were a

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2 plethora of people there.

3 Q. What I mean is did you meet with  
4 anybody else besides your counsel to prepare  
5 for the deposition?

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6 A. No.

7 Q. Did you look at any documents to  
8 prepare for the deposition during those  
9 meetings?

10 A. I did receive the deposition  
11 that I -- -- what is the thing called.

12 MS. PARVIS: Affidavit.

13 A. The affidavit that I signed.

14 Q. So you looked at a copy of your  
15 declaration that was filed in this case to  
16 prepare for the deposition?

17 A. Yes.

18 Q. Did you look at any other  
19 documents?

20 A. No.

21 Q. So I'm not interested in your  
22 counsel's testimony, I'm really only  
23 interested in what you know and what you  
24 remember, and so one of the things I always  
25 like to say a deposition is an exam, but

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2 it's not a test so if you don't know  
3 something it's perfectly fine to say you  
4 don't know. If you don't remember something  
5 it's perfectly fine to say you don't  
6 remember of the that's what I'm interested  
7 in whether you know and whether you  
8 remember. You know can't answer ask your  
9 counsel because then I'm learning what the  
10 counsel knows do you understand?

11 A. I understand.

12 Q. I'm going to show you a document  
13 that we're going to mark for identification  
14 as Goodwin Exhibit 1.

15 (Goodwin Exhibit # ,  
16 description, marked for  
17 identification, as of this date.)

18 Q. Document you have of before you  
19 marked as Goodwin Exhibit 1 says at the  
20 middle of the page declaration of Eric  
21 Goodwin take a few minutes to look it over  
22 and then turn to the last page of the  
23 document, which page 9. There is a  
24 signature it's sort of the upper middle the  
25 page do you recognize that to be your

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2 signature?

3 A. One minute counselor I'm just  
4 reviewing it.

5 Q. Take your time.

6 A. Counsel could you repeat your  
7 last question?

8 Q. I'd be happy to.

9 Turn to page 9 the upper middle  
10 area of the page, do you recognize that  
11 signature?

12 A. Yes, do I.

13 Q. Is that your signature?

14 A. Yes, it is.

15 Q. Do you remember signing this  
16 document on November 16, 2017?

17 A. Yes, do I.

18 Q. At the top of the page where it  
19 says I declare under penalty of perjury that  
20 the fore going is true and, correct, do you  
21 remember reading that line before signing?



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22 A. Yes, I do.

23 Q. And you understand what it  
24 means?

25 A. Yes, I do.

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2 Q. Please turn to page 2, paragraph  
3 8, in the second sentence of that paragraph  
4 it says I did not vote for Mr. Charles or  
5 Mr. Germain when they ran for office in  
6 2013 or 2016, do you see that?

7 A. Yes, I do.

8 Q. Who is Mr. Charles?

9 A. He is one of the individuals on  
10 the school -- currently on the school board.

11 Q. Do you know Mr. Charles?

12 A. Personally no.

13 Q. Who is Mr. Germain?

14 A. He's also on the school board.

15 Q. Do you know Mr. Germain?

16 A. Not personally.

17 Q. Is Mr. Charles a black man?

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18 A. Yes, he is.

19 Q. Is Mr. Germain a black man?

20 A. Yes, he is.

21 Q. You say that you did not vote

22 for Mr. Charles when he ran for office in

23 2013 or 2016 right?

24 A. That is correct.

25 Q. Why didn't you vote for

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2 Mr. Charles in 2013?

3 A. The candidate apparently did not

4 have the support of the public school

5 community.

6 Q. So let's break that up a bit.

7 What do you mean when you say

8 public school community?

9 A. The individual did not --

10 Mr. Charles did not solicit, win the

11 approval of individuals within the public

12 school community.

13 Q. When you say public school

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14 community, what do you mean by that?

15 A. The people who would more likely  
16 attend and send their children to public  
17 schools.

18 Q. What sort of people are those?

19 MS. PARVIS: Objection.

20 A. Anyone who lives in East Ramapo.

21 Q. So anyone who lives in East  
22 Ramapo is a member of the public school  
23 community?

24 A. Anyone who lives in East Ramapo  
25 can send their children to public schools.

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2 Q. Who in East Ramapo is a member  
3 of the public school community?

4 MS. PARVIS: Objection.

5 A. Individuals in East Ramapo who  
6 are members of the public school community  
7 are the ones who have or can send their  
8 children to public schools.

9 Q. To your knowledge is there

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10 anyone in East Ramapo who can't send their  
11 children to the public schools?

12 MS. PARVIS: Objection.

13 A. Not to my knowledge.

14 Q. When you say public school  
15 community, who are you referring to?

16 A. Anyone who can and will send  
17 their children to public school.

18 Q. But isn't that everyone in East  
19 Ramapo?

20 MS. PARVIS: Objection.

21 A. Allegedly yes.

22 Q. All right. So your testimony is  
23 that Mr. Charles to your knowledge did not  
24 obtain the support of everyone in East  
25 Ramapo?

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2 MS. PARVIS: Objection.

3 A. Everyone who would and wanted to  
4 send their children -- would or could send  
5 their children to public school.

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6 Q. Is there anyone in East Ramapo  
7 to your knowledge who is not a member of the  
8 public school community?

9 MS. PARVIS: Objection.

10 A. I would have no way of knowing.

11 Q. Why do you use the phrase public  
12 school community?

13 A. I use the phrase public school  
14 community because public schools are for all  
15 to use whether the individuals choose not to  
16 send their children to public schools that's  
17 their individual right.

18 Q. Are people who choose not to  
19 send their children to the public schools in  
20 your mind not members of the public school  
21 community?

22 MS. PARVIS: Objection.

23 MR. LEVINE: What's the basis of  
24 that?

25 MS. PARVIS: How would he have

18

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2 any idea of knowing that.

3 MR. LEVINE: I'm asking his  
4 understand.

5 Q. What is your understanding of  
6 when you use the phrase "public school  
7 community," do people who don't send their  
8 children to public school qualify as members  
9 of the public school community?

10 A. Yes, they do.

11 Q. Does the public school community  
12 include black people?

13 A. Yes, it does.

14 Q. Does the public school community  
15 include Latino people?

16 A. Yes, it does.

17 Q. Does the public school community  
18 include white people?

19 A. Yes, it does.

20 Q. Does the public school community  
21 include Jewish people?

22 A. Yes, it does.

23 Q. You have an understanding about  
24 how many people would you say are in the  
25 public school community?

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2           A.     Based on what I know what I've  
3     been briefed on, there are about 8 thousand  
4     kids within the public school community who  
5     are actually physically attend public  
6     schools.

7           Q.     And your understanding is that  
8     there are more people in the public school  
9     community than the children who attend the  
10    public schools; is that right?

11          A.     Yes.

12          Q.     So about how many people if you  
13    have an understanding makeup the public  
14    school community?

15          A.     There are what approximately 55  
16    thousand people in East Ramapo?

17          Q.     If you say so?

18          A.     Per the numbers that I've heard.

19          Q.     Okay. So about 55 thousand  
20    people makeup the public school community;  
21    is that right?

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22 A. That is correct.

23 Q. Turning back to Mr. Charles I'm  
24 paraphrasing so if I don't have it correctly  
25 correct me, please, but your testimony is

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2 that you didn't vote for Mr. Charles because  
3 you understood that he didn't have the  
4 support of the public school community in  
5 East Ramapo, right?

6 A. That is correct.

7 Q. Did Mr. Charles win that  
8 election?

9 A. Yes, did.

10 Q. How did Mr. Charles win that  
11 election if all 55 people in East Ramapo  
12 didn't support him?

13 MS. PARVIS: Objection.

14 A. He got more votes than the  
15 opposing candidates.

16 Q. If you have an understanding who  
17 voted for him?



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18 A. Oh, I'm not in the voting ballot  
19 box with the various individuals.

20 Q. Do you have an understanding  
21 that somebody must have voted for him?

22 MS. PARVIS: Objection.

23 A. Being that he won yes I have a  
24 firm understanding that someone voted for  
25 him.

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2 Q. All right. If I were to use the  
3 phrase private school community would you  
4 know what I was talking about?

5 A. Yes.

6 Q. Do you have an understanding of  
7 what the phrase private school community  
8 refers to?

9 A. Yes.

10 Q. What does the private school  
11 community refer to?

12 A. Individuals who opt and choose  
13 to send their children to private schools.

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14 Q. Is the private school community  
15 part of the public school community?

16 A. Yes, it is.

17 Q. Did members of the private  
18 school community vote in the East Ramapo  
19 elections in 2016 to your knowledge?

20 MS. PARVIS: Objection.

21 A. Could you say the question again  
22 counsel?

23 Q. Yes. To your knowledge, did any  
24 members of the private school community vote  
25 in the 2016 election?

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2 A. I would imagine so counsel.

3 Q. Other than your prior testimony  
4 that you believe Mr. Charles did not have  
5 the support of the public school community,  
6 were there any specific reasons why you  
7 didn't vote for Mr. Charles in 2016?

8 A. Well, again he was unable to  
9 win, and convince the public school

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10 community that his cause was in the best  
11 interest of individuals who sent their  
12 children to public schools.

13 Q. To your knowledge did  
14 Mr. Charles win the election in 2016?

15 A. Yes, he did.

16 Q. My question was were there  
17 specific reasons why you chose not to vote  
18 for Mr. Charles?

19 A. An it's been overall consensus  
20 that he was not there to represent the  
21 overall needs of the individuals that  
22 sent -- or the students who attended the  
23 public school system.

24 Q. Do you know why there was such a  
25 consensus?

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2 MS. PARVIS: Objection.

3 A. I just it was an overall feeling  
4 most of the people in the district most of  
5 the people who sent their children to public

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6 schools let me clarify that.

7 Candidates run all the time.

8 They don't always appeal to various group  
9 within communities.

10 Q. Did Mr. Charles do something  
11 that you disagreed with?

12 A. One of my big things was the  
13 lack of campaigning to me and my area and  
14 town. I don't recall outside if he spoke at  
15 a campaign rally or a candidate forum. I  
16 saw the other candidates heavily throughout  
17 the community with an intent to try to  
18 solicit my vote. I don't recall either  
19 candidate Charles or -- Germain Charles or  
20 Pierre doing any campaigning towards me.

21 Q. What about as a member of the  
22 board of education did Mr. Charles do  
23 anything specific that you disagreed with?

24 A. Specifics they're going to  
25 escape me now, but a lot of the voting did

24

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2 not go into favor of the public school  
3 community.

4 Q. Can you recall as you sit here  
5 today, any particular votes that you would  
6 say did not go in favor of the public school  
7 community?

8 A. One in particular would be a  
9 decision to add a transportation executive  
10 to the didn't at 160 thousand dollars a year  
11 plus overtime for cash strapped school  
12 district considering the transportation cost  
13 was tremendous at the time.

14 Q. What do you mean by a  
15 transportation executive?

16 A. They wanted to hire someone to I  
17 guess manage transportation in the  
18 distribute at a cost of 162 thousand dollars  
19 plus overtime.

20 Q. When did that occur?

21 A. I saw that in 2017.

22 Q. And Mr. Charles supported that  
23 effort?

24 A. From my understanding yes.

25 Q. Do you know why he supported

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2 that effort?

3 A. I do no.

4 Q. Did the distribute ultimately  
5 retain a transportation executive?

6 A. I'm not a hundred percent sure.

7 Q. Are you less than a hundred  
8 percent sure?

9 MS. PARVIS: Objection.

10 A. I'm not sure.

11 Q. You don't know?

12 A. I don't know.

13 Q. Okay.

14 So do you know why the board of  
15 education was considering hiring a  
16 transportation executive?

17 A. Part of the reason was due to  
18 the high cost of transportation for the  
19 distribute. And from my understanding the  
20 condition of the fleet, the school bus  
21 fleet. Amongst other things.

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22 Q. How do you know that there is a  
23 high cost of transportation for the  
24 district?

25 A. That's one of the large of

26

1  
2 evident consumption based on the reports  
3 that are put out that was one of the largest  
4 line items in the school district.

5 Q. What reports were you  
6 referencing?

7 A. They put out a report out from  
8 the school district the board puts out a  
9 report that anyone can see.

10 Q. Is it a budget report?

11 A. Yes, budget report.

12 Q. Anyone could see the budget  
13 report?

14 A. Yes.

15 Q. Do you know how the district's  
16 transportation costs compared to other  
17 school districts?

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18 MS. PARVIS: Objection.

19 A. No I do not.

20 Q. Why do you why do you  
21 characterize the transportation cost as  
22 high?

23 A. 8 million dollars to transport a  
24 to transport students is a bit of an  
25 excessive amount. In my military career

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2 we've handled transportation issues and the  
3 cost is high, but to talk about a community  
4 55 thousand people in number, 8 million in  
5 school bus fees, that could be a bit  
6 excessive from my opinion.

7 Q. Do you know how many students  
8 the district buses?

9 A. From my understanding somewhere  
10 about close to 40 thousand -- I'm not sure.  
11 I don't want to speculate. I'm not sure.

12 Q. Well, so correct me if I'm  
13 wrong, you testified earlier there were



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14 about 8,000 public school students right?

15 A. Yes.

16 Q. Do you have any understanding  
17 about how many private school students there  
18 are in the school district?

19 A. Again, I'll be speculating, but  
20 I remember it being somewhere close to 30  
21 thousand.

22 Q. Do you know whether the school  
23 district is responsible for busing private  
24 school students?

25 A. Yes.

28

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2 Q. Would it be fair to say the  
3 district buses close to but not quite 40,000  
4 private school students -- students total,  
5 rather?

6 A. Yes.

7 Q. Knowing that do you think your  
8 estimate of 55 thousand people in the  
9 district might be a little low?

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10           A.     It could be. Again I'm not the  
11 census bureau, so.

12           Q.     Do you know whether any other  
13 school district in Rockland county buses  
14 40,000 students?

15           A.     No.

16           Q.     Do you know whether any other  
17 school district in New York buses 40,000  
18 students?

19           A.     Counsel, I'm from the Bronx. I  
20 didn't take school bus to school. We walked  
21 or took public transportation. So the  
22 concept of busing is a bit new, but in terms  
23 of the needs of various other school  
24 districts, I'm not certain.

25           Q.     Fair enough.

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2                    Would you agree it's hard to say  
3 whether 8 million dollars is high in terms  
4 of busing costs if you don't know what to  
5 compare it to?

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6 MS. PARVIS: Objection.

7 A. Part of the purpose of the  
8 school board, counselor, is to manage costs  
9 and there is a possibility that there could  
10 be a bit redundancy. If we can objectively  
11 seek to lower costs, why would I concerned  
12 citizen as a taxpayer as a parent even be  
13 concerned.

14 Q. Do you know how much the  
15 district spends per student to bus them?

16 A. I knew that number offhand at  
17 one time. I can't remember it offhand now.

18 Q. Do you know what any other  
19 school district in Rockland County spends  
20 per student to bus their student?

21 A. No.

22 Q. As you sit here today, do you  
23 know of any inefficiencies in the way the  
24 school district spends transportation  
25 dollars?

30

MrEricGoodwin\_Rough

2           A.     Based off what I see, like I  
3     said it could be some redundancies. Offhand  
4     I can't think of anything offhand.

5           Q.     Besides the issue of the  
6     transportation executive is there anything  
7     else Mr. Charles did as a school board  
8     member that you disagreed with?

9           A.     I would have to say the selling  
10    off of school assets buildings things of  
11    that nature.

12          Q.     What do you mean by that?

13          A.     Buildings were sold for pennies  
14    on the dollar. I didn't particular agree  
15    with that.

16          Q.     What building was sold?

17          A.     A number of -- some of the old  
18    schools.

19          Q.     How many schools?

20          A.     I can't remember offhand.

21          Q.     More than one?

22          A.     Several.

23          Q.     Several schools.

24                   How do you know the schools were  
25    sold for pennies on the dollar?

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2           A.     I remember reading in the  
3     periodical that an individual was brought up  
4     on charges for the appraisal of the schools  
5     or something of that nature, and then I  
6     remember where the seller of the school --  
7     of the building was halted for some type of  
8     improprieties.

9           Q.     Do you know which building  
10    specifically?

11          A.     I can remember which building.  
12    At the time I was fairly new to the  
13    district.

14          Q.     Do you know the sale price of  
15    any particular building?

16          A.     I can't remember it offhand.

17          Q.     Do you know the appraisal value  
18    of any particular building?

19                   MS. PARVIS: Objection.

20          A.     I can't remember it offhand.  
21    I'm not an appraiser.

MrEricGoodwin\_Rough

22 Q. Do you know if Mr. Charles voted  
23 in favor of either of those sales that you  
24 described?

25 A. From my understanding he voted

32

1

2 in favor.

3 (Record read.)

4 Q. Is there anything else as you  
5 sit here today that you being recall  
6 Mr. Charles did that you disagreed with?

7 A. I can't remember.

8 Q. How about Mr. Germain as you sit  
9 here today can you recall anything  
10 Mr. Germain did as many of the board of  
11 education that you disagreed with?

12 A. From my understanding he pretty  
13 much went along the same lines as Charles  
14 Pierre.

15 Q. By Charles Pierre are you  
16 referring to the other board member Sabrina  
17 Charles Pierre?

MrEricGoodwin\_Rough

18 A. Oh, I'm sorry not Charles I'm  
19 sorry. What his name? The other --  
20 Mr. Charles.

21 Q. Do you know of any specific  
22 things that Mr. Germain did as a board  
23 member that you disagreed with?

24 A. Like I said before, they pretty  
25 much went along the same lines. On top of

33

1  
2 the fact that on a number of occasions  
3 individuals didn't show up to school board  
4 meetings, but outside of that.

5 Q. What individuals didn't show up  
6 to board meeting?

7 A. A number of different members,  
8 but in some instances, I think Mr. Germain a  
9 number of occasions that I have been there,  
10 he wasn't at the board meetings.

11 Q. What about Mr. Charles?

12 A. For the most part he was  
13 present.

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14 Q. The same paragraph, paragraph 8,  
15 second sentence, you say, I'll read it so  
16 folks could read along, "I do not know of  
17 any black or Latino voters who voted for  
18 Mr. Charles or Mr. Germain in 2013 or 2016;  
19 do you see that?

20 A. Yes, I do.

21 Q. Did you write this declaration?

22 A. Yes, I did.

23 Q. Did anybody help you with it?

24 A. In conjunction with my counsel.

25 Q. Other than your counsel did

34

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2 anybody else help you write this?

3 A. No.

4 Q. And you wrote it yourself?

5 A. Yes.

6 Q. So you wrote the sentence "I do  
7 not know of any black or Latino voters who  
8 voted for Mr. Charles or Mr. Germain in 2013  
9 or 2016"?



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10 A. Yes.

11 Q. Why would you know how other  
12 black or Latino voters vote?

13 MS. PARVIS: Objection.

14 A. I speak to people. And I did  
15 not speak to everyone in Rockland County. I  
16 did not speak to every African-American in  
17 Rockland County. But I'm a member of an  
18 African-American ^ organizations which are  
19 actively involved in the community. I come  
20 into contact with a large number of people,  
21 Haitian, Hispanic. We do programs  
22 supporting that base. Conversations come up  
23 in which those two particular two names have  
24 always -- has come up on a number of  
25 occasions.

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2 Q. People have told you who they  
3 voted for in public school elections in East  
4 Ramapo?

5 A. People for the most part have

MrEricGoodwin\_Rough

6 told me their disdain for Charles and  
7 Germain.

8 Q. But has anybody told you who  
9 they voted for in any public school election  
10 in East Ramapo?

11 A. Directly, no. They've always  
12 said that the candidates that they supported  
13 have never been elected.

14 Q. All right. So when you say you  
15 did not know of any black or Latino voters  
16 who voted for Mr. Charles or Mr. Germain in  
17 2013 or 2016, do you know how any -- who any  
18 black or Latino voter voted for other than  
19 yourself in 2013 or 2016?

20 MS. PARVIS: Objection.

21 A. Say the question again I'm  
22 sorry.

23 Q. Other than yourself, do you know  
24 how any black or Latino voter voted in 2013  
25 or 2016?

36

MrEricGoodwin\_Rough

2           A.     In conversations individual  
3     expressed enthusiasm in hoping that we won,  
4     so I could only go by the people that I  
5     spoke to who demonstrated support for me.  
6     Those are the only -- the sample size that I  
7     have to go by.

8           Q.     How big of a sample size is  
9     that?

10          A.     Well, apparently less than 5  
11     thousand.

12          Q.     So you're saying that you talked  
13     to less than 5 thousand people and they told  
14     who they voted for in 2013 and 2016?

15          A.     I spoke to a mass number of  
16     people with various churches community  
17     organizations and they've talked to me and  
18     said that they we hoped that we won  
19     individuals on the board were not even  
20     attempting to try to meet their needs and as  
21     a result that they were going to vote for  
22     me.

23          Q.     Can you recall anybody who told  
24     you how they voted in 2013 and 2016  
25     specifically?

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MS. PARVIS: Objection.

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A. No, during that time it was more so that people were just talking about their disdain for the members who were elected to the board.

7

8

9

Q. Did you develop an understanding of why they have disdain for the members of the board?

10

11

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19

A. Actually, yes. Prior to moving to Rockland County I lived in the Bronx I had family and friends who lived in Rockland County. Rockland County was the place to go one of the best school districts in the country in the state by the time I get here ice amongst the bottom. Watching a district go from one of the best to one of the worst it obviously creates a level of resentment to the individuals that are elected.

20

21

Q. Do you have an understanding of why what you just described in terms of the

MrEricGoodwin\_Rough

22 district why that occurred?

23 A. Fiscal mismanagement, poor  
24 leadership, a lack of -- lack of  
25 stakeholders in the community.

38

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2 Q. What do you mean by a lack of  
3 stakeholders in the community.

4 A. If you were truly concerned  
5 about the state of the school board or the  
6 school district the minute the district  
7 starts to go on a down swing you would do  
8 everything anything and everything you can  
9 to propel it forward to go from number 1 to  
10 whatever we are now and to sit there with a  
11 stoic look and for the most part not as  
12 responsive as one need be it's obvious that  
13 you doesn't have a stake in the community.

14 Q. I'm not sure I understand. When  
15 you say a lack of lack of stakeholders in  
16 the school district who would be the  
17 stakeholders?

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18           A.     It would be the community as a  
19     hole. These are individuals who send their  
20     children to public schools with the intent  
21     on getting them the best education so they  
22     could be the most productive and positive  
23     influences within the community. A  
24     deteriorating school district in particular  
25     a school system makes that less likely to

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2     occur.

3           Q.     What should the stakeholders  
4     have done differently?

5           A.     Well, for one fiscal management  
6     is key.

7           Q.     If the stakeholders refer to  
8     everybody in East Ramapo, right?

9           A.     Well, there are stakeholders and  
10    there are shareholders.

11          Q.     What do you mean by that?

12          A.     Well, stakeholders have a stake  
13    in it. I'm a stakeholder because I'm

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14 sending my child to that public school. I  
15 want the best out of the public schools. My  
16 child could graduate -- I make a descent  
17 living, I can send my child to private  
18 school if I want, but he the individuals in  
19 the public schools for the most part look  
20 like me. I am a stakeholder. I want  
21 individuals within our community to improve,  
22 to have a decent shot at becoming the best  
23 possible citizens that they can. That's a  
24 stakeholder. A shareholder are those  
25 individuals who are more concerned with

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1  
2 whatever their particular wants or desires  
3 are.

4 Q. Is there sort of a difference of  
5 interest between stakeholders and  
6 shareholders; is that what you're  
7 describing?

8 A. Well, I remember when I went to  
9 college, I had to have not only good grades,

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10 but I had to be active within the community.  
11 I had to take part in certain activities,  
12 sports, debate, things of that nature. When  
13 you start cutting programs, that makes it  
14 that much harder for the children of the  
15 public school communities to compete, to get  
16 into some of these higher echelon  
17 institutions. That's what I mean by what I  
18 said.

19 Q. I'm still not sure I understand.  
20 I'm just trying to understand --

21 A. I got you.

22 Q. Shareholders and stakeholders,  
23 are you saying they have different  
24 interests?

25 A. Let's use a company.

41

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2 Q. Okay.

3 A. What does a shareholder get out  
4 of a company?

5 Q. Why don't you let me ask the



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6 questions.

7 A. Well, I'm -- that's --

8 Q. What do you think a shareholder  
9 gets out of the company?

10 A. A shareholder tends to benefit  
11 from the company for whatever, financially  
12 whatever, whatever gain they get. The  
13 stakeholder wants to see the company  
14 improve, wants to see it grow. I don't see  
15 that with the individuals on the school  
16 board.

17 Q. So the individuals on the school  
18 board are shareholders in your mind, right?

19 A. In my mind yes.

20 Q. What does that mean in real --  
21 like real terms because shareholders is a  
22 metaphor and it's a useful one --

23 A. That's right.

24 Q. -- right? But what about the  
25 members of the school board leads you to

42

MrEricGoodwin\_Rough

2 believe they are not stakeholders?

3 A. Counsel, I went to Afghanistan,  
4 when we went to Afghanistan there we had to  
5 do our due diligence, get our geographical  
6 whole view of the land. Afghanistan, I  
7 think they said, was 2 percent literate when  
8 we arrived. We build schools. We put money  
9 in the infrastructure. I think it's some  
10 where about 20 percent now. I'm going to  
11 sit there as an individual, as an adult, sit  
12 there and watch a third world country make  
13 leaps and bounds in education in such a  
14 short period of time, and I'm in the most  
15 powerful nation in the world, and we can't,  
16 we're going from one to whatever. That's  
17 what I'm...

18 Q. Staff sergeant Goodwin, right?

19 A. Chief Warrant Officer Three  
20 promotable.

21 Q. You one won a bronze star?

22 A. And two meritorious service  
23 medals.

24 Q. What did you get the bronze star  
25 for?

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43

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2           A.     I was the chief of personnel  
3 plans and operations for Iraq.

4           Q.     And bronze star is for valor?

5           A.     Service.

6           Q.     Service.

7                   Nobody is questioning you  
8 commandments to service right now. I just  
9 want to understand your views as clearly as  
10 I can.

11                   So what I mean is when you say  
12 the members of the school board aren't  
13 stakeholders and you say that they don't  
14 have the best interest of the school  
15 district in mind, what is it about them that  
16 makes you think that?

17           A.     Simply put, the state had to  
18 come in and pretty much manage the district.  
19 I'm sorry, counsel, in all my jobs, if  
20 anyone had to come in and provide oversight,  
21 that means mismanagement amongst other

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22 things. There is a need for dire change.  
23 They have to want to improve the district.  
24 I see the numbers, I see the shortcomings I  
25 deal with this daily. You brought up my

44

1  
2 bronze star.  
3 Q. I did.  
4 A. I got that bronze star because I  
5 looked at the deficiencies I came one plans  
6 in which I could attack different  
7 deficiencies and they generated results.  
8 Period. You can't tell me looking at this  
9 school district that these individuals that  
10 had been there the successful businessman  
11 ran the school district into the condition  
12 that it is now and say that they truly are  
13 concerned about the state of the education  
14 system in this district.  
15 Q. Do -- are they not concerned  
16 about the school district because their  
17 white?

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18           A.     Counselor I could never tell the  
19     motives behind the individuals on the school  
20     district I could just tell what you I see as  
21     results.

22           Q.     So does the race of a school  
23     board member matter to you at all?

24           A.     Counselor I would vote for the  
25     best qualified person for any position

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1  
2     regardless of race creed culture sex  
3     ethnicity the whole line we're talking about  
4     my child, grant it, I'm a proud  
5     African-American unapologetic done, but if a  
6     Jewish woman could do a better job over an  
7     African-American man she has my vote. We're  
8     talking about my child.

9           Q.     Is it fair to sum up your  
10     dissatisfied with the school board because  
11     you think they're bad at their jobs?

12           A.     Yes.

13           Q.     Fair enough.

MrEricGoodwin\_Rough

14 Is that why you ran for the

15 school board?

16 A. Yes.

17 Q. When did you run for the school

18 board?

19 A. 2017.

20 Q. Did you run with anybody else on

21 a slate?

22 A. Yes, Chevon and Allie, Chevon

23 DOS and Alexandra Manigo.

24 Q. Did your slate have a campaign

25 platform?

46

1

2 A. Yes transparency accountability

3 are sum of the pillars of it.

4 Q. Did you create a website for

5 your campaign?

6 A. Yes.

7 Q. If I was to?

8 A. Facebook. More so a Facebook

9 page.

MrEricGoodwin\_Rough

10 Q. If I was to use the phrase "East  
11 Ramapo Coming Together," would you recognize  
12 that, would you know what that is?

13 A. Yes.

14 Q. Is that your website for the  
15 campaign?

16 A. That is, yes.

17 Q. It is, okay.

18 MR. LEVINE: I'm going to mark  
19 for identification Goodwin Exhibit 2.

20 (Goodwin Exhibit # ,  
21 description, marked for  
22 identification, as of this date.)

23 Q. You have been shown a document  
24 that we've marked as Goodwin Exhibit 2.  
25 There is a title at the top of the page

47

1  
2 underlined called "East Ramapo Coming  
3 Together" do you see that?

4 A. Yes, I do.

5 Q. Does this look like a printout

MrEricGoodwin\_Rough

6 of your campaign website?

7 A. Yes.

8 Q. As you sit here today do you see  
9 anything that appears to have been changed  
10 in any way from the website that you're  
11 familiar with?

12 A. Nothing comes out immediately  
13 no.

14 Q. The sub title on this page says  
15 fairness for all child and you're goals do  
16 you see that?

17 A. Yes.

18 Q. So does this represent a  
19 statement of your campaigns platform?

20 A. Yes, it does.

21 Q. Is there anything else that was  
22 a significant issue for your campaign that  
23 was not included in your platform?

24 A. Not that I recall.

25 Q. So the first goal says high

48



MrEricGoodwin\_Rough

2 expectations for all children do you see  
3 that?

4 A. Yes.

5 Q. I'm summarizing correct me if  
6 you disagree, but this goal seems to be  
7 about improving services in order to improve  
8 outcomes for public school students right?

9 A. Yes.

10 Q. As part of your campaign were  
11 you ever asked to consider the expense to  
12 the district to fulfill the goals set out  
13 for the high expectations for all children?

14 MS. PARVIS: Objection.

15 A. In running for a particular  
16 office in which you're dealing with budgets,  
17 the expenses are always something that is  
18 considered.

19 Q. So you did consider the  
20 potential expenses to the district?

21 A. Yes.

22 Q. Did you estimate the expense?

23 A. Actually no. Once -- to make  
24 estimations prior to being elected would be  
25 delusions of grand dire I mean I would have

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2 to sit down see what's coming in what are  
3 the underlying assets and things of that  
4 nature, so I would have to -- sitting there,  
5 making any type of estimations prior to  
6 being elected to a position would be  
7 foolhardy at best.

8 Q. Do you own a home in East  
9 Ramapo?

10 A. Yes, I do.

11 Q. Do you pay property taxes in  
12 East Ramapo?

13 A. Yes, I do.

14 Q. Do you know what the property  
15 tax rate is currently?

16 A. Offhand, no. I just know what I  
17 pay in property taxes.

18 Q. What do you pay in property  
19 taxes?

20 A. I pay about 6 thousand dollars.

21 Q. Was it part of your campaign

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22 platform to increase the property tax rate  
23 to cover any additional expenses to achieve  
24 your goal?

25 A. That was a part of the campaign

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1  
2 platform, but it was something that we --  
3 that you have to understand that it could  
4 possibly occur, I'm a home owner, I  
5 understand if you live in a good school  
6 district usually property taxes are higher  
7 that's just par for the course.

8 Q. Right. Did your campaign ever  
9 take an official position one way or the  
10 other on property tax rates?

11 A. Not particularly, no.

12 Q. Would you say that the property  
13 tax rates weren't a main focus of your  
14 campaign?

15 A. It was not the main focus.

16 Q. What about providing education  
17 services to private school students was that

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18 a main focus of your campaign?

19 A. At the early stages of  
20 campaigning we reached out to the private  
21 school communities to see what were their  
22 particular needs, we heard nothing back from  
23 them.

24 Q. Tell me about that, what did you  
25 do to reach out to private school

51

1  
2 communities?

3 A. Sent various e-mails out to the  
4 various P T As at the private schools as  
5 well as -- as well as the school themselves.

6 Q. Do you still have those e-mails?

7 A. I should have them I have to  
8 check.

9 Q. Do you remember anybody specific  
10 that you sent e-mails to of that kind?

11 A. Just a general e-mail to the  
12 principals. I think the principal and the  
13 PTA.

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14 Q. What did you ask them?

15 A. Just an opportunity to speak  
16 with them to understand their concerns. I  
17 was running for school board never got  
18 anything back.

19 Q. Did you do anything else?

20 A. We had a meeting -- we tried to  
21 meet with other groups within the private  
22 school community and that didn't turnout to  
23 be as fruitful as we would have liked.

24 Q. In this particular context when  
25 you say private school community, do you

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1  
2 mean the orthodox and Hasidic school  
3 community?

4 A. And the Catholic schools.

5 Q. Did you send e-mails like it  
6 this to Catholic school administrators?

7 A. That's who I sent it to the  
8 Catholic school administrators.

9 Q. If I use the word yeshiva do you

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10 know what that is?

11 A. Yes.

12 Q. What is a yeshiva?

13 A. It's a school that religious  
14 based for the Jewish community.

15 Q. Did you send e-mails to yeshiva  
16 administrators?

17 A. No we did not.

18 Q. How many Catholic schools are  
19 there in the distribute?

20 A. I sent it to two.

21 Q. Do you remember the names of the  
22 schools?

23 A. Saint Anthony's and I forget the  
24 other one.

25 Q. No one responded from saint

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2 Anthony's?

3 A. Neither Catholic schools.

4 Q. Other than e-mails did you do  
5 anything to reach out to the Catholic school

MrEricGoodwin\_Rough

6 administrators?

7 A. Actually after that no.

8 Q. Did you do anything to reach out  
9 to the yeshiva administrators?

10 A. Well, we reached out to the  
11 yeshiva community which we had a forum in  
12 which we wanted to sit down and address  
13 issues and concerns that affect the  
14 yeshivas.

15 Q. If you would take a look at your  
16 declaration which we have marked for  
17 identification as Exhibit 1 when you  
18 testified just now that there was a forum,  
19 are you referring to the event at the green  
20 meadow Waldorf school described in paragraph  
21 20 of your declaration?

22 A. Yes that is correct.

23 Q. The first sentence of paragraph  
24 20 I'll read it so folks could follow along  
25 it just says that I was not invited to any

54

MrEricGoodwin\_Rough

2 candidate forums in predominantly white  
3 community in the district including New  
4 Square Kaser and Monsey do you see that?

5 A. Yes.

6 Q. Does that mean that the event at  
7 the green meadow Waldorf school in chestnut  
8 school was not a candidate forum in a  
9 predominantly white community?

10 A. What that means is -- the  
11 purpose of that forum was to meet with the  
12 private school community so we could address  
13 any issues and concerns so that if we were  
14 to win that we could better address their  
15 needs when I say candidate forum I mean when  
16 the candidates get up individuals from the  
17 various communities present their concerns  
18 and both sides have a chance to debate  
19 and/or address their needs. There was no  
20 two sides to that event.

21 Q. Do you remember when the green  
22 meadow Waldorf school event occurred?

23 A. Probably I'm not sure probably  
24 April or may I'm not exact sure.

25 Q. Do you know whether besides your



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2 slate anyone else had announced their can I  
3 for the school board at that time?

4 A. Outside of the incumbents there  
5 was one vacant seat and weigh had no  
6 knowledge of who that individual was.

7 Q. Turning back to paragraph 20  
8 when you say predominantly white communities  
9 of the didn't including new square Kaser and  
10 Monsey in this context does predominantly  
11 white communities mean orthodox and Hasidic  
12 Jewish communities?

13 A. It means exactly what it says  
14 white.

15 Q. Sure, but, but new square is new  
16 square an orthodox or Hasidic Jewish  
17 community?

18 MS. PARVIS: Objection.

19 Q. If you know?

20 A. I've been to new square I've  
21 seen a large number of Hasidic and

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22 Orthodoxes in the community, but I've also  
23 seen non Hasidic and orthodox living there.

24 Q. So you don't know?

25 A. I don't know specifically the

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2 breakdown of religion all I know is what I  
3 see physically.

4 Q. How do you know new square is  
5 predominantly white?

6 A. I live in Rockland County I've  
7 driven through many of the areas.

8 Q. So it's just the religion that  
9 you're unsure of?

10 A. Well, not all religions where  
11 particular garb Spring Valley for example is  
12 predominantly black and Hispanic with whites  
13 that live there, but I would classify that  
14 as a black or Hispanic area.

15 Q. What about Kaser what is that?

16 A. That's another --

17 MS. PARVIS: Objection.

MrEricGoodwin\_Rough

18 A. That's another area in Rockland.

19 Q. Is it a neighborhood?

20 A. It's a neighborhood yes.

21 Q. How do you know Kaser is

22 predominantly white?

23 A. The same, I know new square

24 Monsey Spring Valley you drive through these

25 areas you see what -- the community.

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2 Q. Have you driven through Kaser?

3 A. I've driven through a

4 significant portion of East Ramapo.

5 Q. Including Kaser?

6 A. Yes.

7 Q. How about Monsey how do you know

8 Monsey is a predominantly white community?

9 A. Same applies to Monsey as Kaser

10 and new square.

11 Q. What does predominantly mean

12 like more than 50 percent?

13 A. That would -- yes, that would be

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14 my --.

15 Q. So predominantly means the same  
16 as majority?

17 MS. CALABRESE: Objection.

18 A. Predominantly majority, I would  
19 classify them as pretty much the same.

20 Q. When you say in paragraph 20  
21 that you were not invited to any candidate  
22 forums in those neighborhoods are you aware  
23 that there were any candidate forums to be  
24 invited to?

25 A. I wasn't aware whether there

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2 were or not.

3 Q. So you don't know whether you  
4 were excluded from a candidate forum, right?

5 A. I don't know that.

6 Q. Maybe there were candidate  
7 forums. Maybe there weren't?

8 A. Well, I know we had a candidate  
9 forum and none of the candidates bothered to

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10 participate.

11 Q. That was in 2017, right?

12 A. Yes.

13 Q. When was your candidate forum?

14 A. I think April or May of 2017.

15 Q. At that point who were the other  
16 candidates?

17 A. I ran against Harry Grossman I  
18 can't remember the other two candidates  
19 especially the new one I never heard I  
20 didn't even know his name until pretty much  
21 the latter days of the election campaign.

22 MS. CALABRESE: We have been  
23 going about an hour.

24 Q. How are you doing do you want to  
25 keep going or take a break?

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2 A. We could take a break.

3 MR. LEVINE: Okay it's 11:30 we  
4 will come back 11:35.

5 (Recess taken.)

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6 Q. Back on the record before the  
7 short break to paraphrase we were discussing  
8 an event that occurred where correct me if  
9 I'm wrong the purpose was intended to get an  
10 understanding or speak with members of the  
11 private school community is that a fair  
12 assessment?

13 A. Yes.

14 Q. Picking back up there, did you  
15 form an understanding of the political  
16 interests or concerns of the private school  
17 community?

18 A. No.

19 Q. As you sit here today do you  
20 have an understanding of what the political  
21 interests of the private school community  
22 are?

23 A. No.

24 Q. Do you did you as a candidate  
25 have an official position on the district's

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MrEricGoodwin\_Rough

2     busing program?

3             A.     Yes.

4             Q.     What was your official position?

5             A.     Basically we had to look at  
6     methods in which we could reduce costs.

7             Q.     If I use the phrase universal  
8     busing do you know what that means?

9             A.     Yes.

10            Q.     What is your understanding of  
11    universal busing?

12            A.     Universal bus something the  
13    busing of all students within the district.

14            Q.     Do you as a candidate form an  
15    official position on whether the district  
16    should maintain a universal busing program?

17            A.     Yes.

18            Q.     What was your official position  
19    on universal busing?

20            A.     My position was that the  
21    district would provide universal busing on  
22    all mandated days.

23            Q.     What do you mean by mandated  
24    days?

25            A.     From my understanding mandated

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2 days were days where the public schools were  
3 open.

4 Q. Were non mandated days days when  
5 the public schools were closed?

6 A. Yes.

7 Q. Why did you take an official  
8 position on mandated versus non mandated  
9 busing?

10 A. The non mandated days were an  
11 additional burden to the district. Parents  
12 in other -- some parents in the private  
13 school community took their children on  
14 mandated busing days physically took their  
15 children to school and they basically took  
16 their children to school.

17 Q. Is it your understanding that  
18 the parents of private school students  
19 wanted the distribute to provide busing on  
20 non mandated days?

21 A. Say that again please.



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22 Q. Was it your understanding that  
23 the parents of private school students  
24 wanted the district to provide busing on non  
25 mandated days?

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2 MS. PARVIS: Objection.

3 A. Yes.

4 Q. So you understood -- let me  
5 rephrase that.

6 As you sit here today you  
7 understand that private school parents  
8 wanted the district to provide busing on non  
9 mandated days; is that right?

10 MS. PARVIS: Objection.

11 A. Yes.

12 Q. Let's try that one more time is  
13 it your understanding that the parents of  
14 private school students wanted the district  
15 to provide non mandated busing on?

16 Yes that's it.

17 A. So that I understand your

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18 question counselor.

19 Q. Um-hum?

20 A. On days where the school  
21 district is closed there is no public  
22 schools, students who go attend private  
23 schools that are open on those days, do  
24 their parents still wants the district to  
25 provide transportation to school for their

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2 children on those days; is that your  
3 question.

4 Q. That is my question.

5 A. My answer is yes.

6 Q. As a candidate did you have an  
7 official position on whether the public  
8 school district should pay for education  
9 services for private school students?

10 A. When you say education services  
11 what are you speaking of?

12 Q. Well, let's do a specific one.

13 As a candidate did you have an official

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14 position on whether the public school  
15 district should pay for school nursing  
16 services for private school students?

17 A. I did not have a -- no.

18 Q. As a candidate did you have an  
19 official position on whether the public  
20 school district should pay for textbooks to  
21 be loaned to private school students?

22 A. Please explain loaned."

23 Q. Loaned in the sense of purchased  
24 by the school district and loaned to private  
25 school students?

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2 A. When you asked textbooks what  
3 type of textbooks are we speaking?

4 Q. I mean my understanding is kind  
5 of irrelevant. Just like a textbook for a  
6 class history textbook?

7 A. History math?

8 Q. Yes.

9 A. From my understanding yes.

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10 Q. So with that understanding let  
11 me ask the question again so there is a  
12 question and answer.

13 Did so as a candidate did you  
14 form an official position on whether the  
15 school district should pay to purchase  
16 textbooks for loan to private school  
17 students?

18 A. I do not have a public stance  
19 that.

20 Q. Do you have a private stance on  
21 that?

22 A. Yes, I do.

23 Q. What was your private stance?

24 A. According to the law the school  
25 district superintendent has purview over the

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2 education of the private schools, so it is  
3 up to the school district to ensure that  
4 they have up to date and current academic  
5 textbooks.

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6 Q. It's up to the school district  
7 to ensure that private schools have up to  
8 date and accurate textbooks?

9 A. Yes.

10 Q. Did you ever tell anybody that?

11 A. Probably no.

12 Q. Why not?

13 A. It was never something that came  
14 up.

15 Q. As a candidate, did you have an  
16 official position on whether the school  
17 district should provide special education  
18 services to students in private schools?

19 A. Yes.

20 Q. What was your position?

21 A. That -- my position basically  
22 was if the child required special education  
23 services that they were entitled to get it.

24 Q. Did you have any other official  
25 positions on the provision of special

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2 education to private school students?

3 A. No.

4 Q. Did you have any other -- well

5 as you sit here today, do you have any

6 particular views on the provision of special

7 education to private school students?

8 A. Do I, yes.

9 Q. What are your views?

10 A. That if the child has -- if the

11 child is in a private school, then I would

12 assume that the private school would take on

13 that position, that requirement.

14 Q. Who should pay for the special

15 education of students attending private

16 schools?

17 MS. PARVIS: Objection.

18 A. Counsel I don't know.

19 Q. I'm just asking for your views

20 on it, who do you think should pay for the

21 special education of students attending

22 private schools?

23 A. The parent of the individual

24 putting the child this the private school.

25 Q. Did you ever tell anybody that?

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2 A. No.

3 Q. Was that issue in your campaign?

4 A. Yes and no.

5 Q. What do you mean by that?

6 A. The cost of the -- of the  
7 special education students was an issue in  
8 terms of; who pays for it was never a  
9 subject matter brought up.

10 Q. What about the cost of paying  
11 for special education students became an  
12 issue in your campaign?

13 A. The issue was regarding the  
14 large number of individuals being funneled  
15 into the special education system.

16 Q. What do you mean by funneled?

17 A. The district had an abnormally  
18 high number of individuals in the special  
19 education system and from my understanding  
20 it was above average for the state.

21 Q. And in what way was that an

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22 issue that you dealt with in your campaign?

23 A. We spoke on how we could -- on  
24 the fact that it needed to be the -- the  
25 cost needed to be minimized and examined as

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2 to what shortcomings are not being met.

3 Q. Do you know whether the private  
4 school community has an interest in special  
5 education students in private schools?

6 MS. PARVIS: Objection.

7 A. Could you say that again please  
8 counsel?

9 Q. Yes. Do you know whether the  
10 private school community as you define them  
11 in your declaration has an interest in the  
12 special education of students attending  
13 private schools?

14 A. Yes.

15 Q. Do you have an understanding of  
16 what their interest is?

17 A. No.



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18 Q. But you know they have an  
19 interest?

20 MS. PARVIS: Objection.

21 A. Yes.

22 Q. Do you think -- okay.

23 Do you know whether -- how about  
24 this, did you ever have an understanding  
25 whether the private school community as you

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1  
2 described it in your declaration has an  
3 interest in the district's universal busing  
4 program?

5 A. Yes, I do. Yes.

6 Q. Do you have an understanding of  
7 what that interest is?

8 A. Yes, I do.

9 Q. What is your understanding ?

10 A. That the private school  
11 community wanted universal busing on non  
12 mandated days.

13 Q. Did you do anything in

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14 particular on your campaign to try to win  
15 votes from parents of private school  
16 students?

17 A. Yes.

18 Q. What did you do?

19 A. We tried to set up a sitdown  
20 with individuals in the private school  
21 community to get a firm understanding of  
22 what their issues and concerns were.

23 Q. Did you take any official  
24 positions that were intended to appeal to  
25 parents of private school students?

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2 A. Yes.

3 Q. What position?

4 A. One of the positions was that  
5 obviously transportation was the sticking  
6 point, the intent was not to eliminate  
7 transportation, but come up with methods in  
8 which we could mitigate the cost so that it  
9 would be less of a burden on the school

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10 district.

11 Q. Did you take any other official  
12 positions that were intended to appeal to  
13 the parent of private school students?

14 A. In our meeting, there was  
15 only -- we -- outside of the transportation  
16 issue we asked what other issues existed and  
17 there was dead silence.

18 Q. So -- because nobody responded  
19 does that mean you're saying you didn't know  
20 what private school parents' interests were?

21 MS. PARVIS: Objection.

22 A. No. Of.

23 Q. You had an understanding of what  
24 private school parents' interests were?

25 A. Somewhat yes.

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2 Q. Did you take any positions as a  
3 candidate designed to appeal to the parents  
4 of private school students as you understood  
5 their interests?

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6 A. Yes.

7 Q. Like what?

8 A. The meeting in which we had in  
9 which we wanted to know what their concerns  
10 and interests were. That was our attempt.

11 Q. But that was an attempt to  
12 understand their interests, right?

13 A. Yes.

14 Q. And that didn't work did it?

15 MS. PARVIS: Objection.

16 A. No it didn't.

17 Q. But did you have an  
18 understanding of private school parents'  
19 interests anyway?

20 A. Somewhat.

21 Q. Did you take any positions  
22 intended to appeal to private school  
23 parents' interests as you understood them?

24 MS. PARVIS: Objection.

25 A. Yes.

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2 Q. Like what?

3 A. Oversight -- more in-depth  
4 oversight in terms what is going on in the  
5 private schools in terms of the academics.

6 Q. Oversight by whom.

7 A. The school board and the  
8 superintendent.

9 Q. Do you believe that the parents  
10 of private school students would support  
11 more oversight of the academics in private  
12 schools by the public school district?

13 MS. PARVIS: Objection.

14 A. I can't speak for parents. I  
15 could only speak for me in that sense.

16 Q. Did you have an official  
17 position as a candidate with respect to  
18 oversight of academics in private schools by  
19 the public school district?

20 A. Yes.

21 Q. What was your official position?

22 A. Methods -- I suggested that  
23 methods be put in place so we could evaluate  
24 how effective the academics were in the  
25 private schools.

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2 Q. Did you have an understanding at  
3 that time that would be popular among  
4 private school parents?

5 MS. PARVIS: Objection.

6 A. I had an understanding that it  
7 wouldn't be, that it wouldn't be popular.

8 Q. So just so I'm clear, you had as  
9 a candidate an official position in favor of  
10 the public school district exercising  
11 oversight over the academics in private  
12 schools, correct?

13 A. Correct.

14 Q. And you understood that that  
15 would not be popular among private school  
16 parents right?

17 MS. PARVIS: Objection.

18 MR. LEVINE: What's the basis  
19 for that objection.

20 MS. PARVIS: You asked him the  
21 same question for about seven minutes

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22 ago.

23 MR. LEVINE: You objected each  
24 time so I will keep doing so if you  
25 keep objecting to unobjectionable

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2 questions. Let's do that again.

3 MS. CALABRESE: He answered it.

4 MS. PARVIS: Exactly. And he  
5 answered --

6 MR. LEVINE: But when you  
7 object, then I don't have answer to my  
8 question.

9 MS. PARVIS: I think there are  
10 two occasions where I let it go  
11 through. But go ahead, you can answer  
12 the question.

13 MR. LEVINE: Thank you. I'll  
14 restate the question.

15 Q. So as a candidate did you have  
16 an official position on whether the public  
17 school district should exercise oversight of

MrEricGoodwin\_Rough

18 the academics in private schools?

19 A. Yes.

20 Q. And at that time you understood  
21 that that would not be popular among private  
22 school parents, right?

23 A. Correct.

24 Q. As part of your campaign, did  
25 your slate make any effort to increase voter

75

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2 turnout?

3 A. Yes.

4 Q. What were those efforts?

5 A. We initiated a grassroots effort  
6 in the sense that we hit all -- every  
7 church, organizational group, fraternity,  
8 sorority, social groups, business, signages  
9 door-knocking campaigns, billboards, flyers,  
10 everything you could think of.

11 Q. Did you have a program to drive  
12 voters to the polls on election day?

13 A. Yes, we did.



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14 Q. Was that program successful?

15 A. Yes and no.

16 Q. As you sit here today do you  
17 know how many people made use of the program  
18 to get rides to the poll?

19 A. I don't know.

20 Q. Would you feel comfortable  
21 estimating?

22 A. No.

23 Q. Was it a significant number of  
24 people?

25 MS. PARVIS: Objection.

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2 A. Again I don't feel comfortable  
3 stating. I don't know.

4 Q. You don't know. Were you  
5 involved in that effort at all?

6 A. No.

7 Q. Do you know who was?

8 A. Offhand no, but it was a number  
9 of people.

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10 Q. Did any community organizations  
11 provide a similar service of giving people  
12 rides to the polls to your knowledge?

13 A. Could you explain that question  
14 counsel?

15 Q. Yes why don't we do it by  
16 specifics of the do you know what the NAACP  
17 of Spring Valley is, right?

18 A. Yes, I do.

19 Q. Do you know if on election day  
20 they drive people to the polls?

21 A. Yes.

22 Q. They do?

23 A. That has been a -- well in  
24 terms -- let me rephrase that in terms of  
25 specific NAACP I don't know offhand.

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2 Q. And other organizations?

3 A. I don't know offhand.

4 Q. Do you know of any organized  
5 effort in the public school community to use

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6 your definition from your declaration to get  
7 people to the polls on election day?

8 A. Just what we were doing.

9 Q. Before your run for the school  
10 district had you ever been involved in  
11 politics before?

12 A. No.

13 Q. Had you ever supported a  
14 candidate's campaign for a political office  
15 before?

16 A. No.

17 Q. Did you vote in prior school  
18 board elections in East Ramapo?

19 A. Yes.

20 Q. Did you form an opinion or  
21 understanding about the extent of black  
22 voter participation in the political  
23 process?

24 A. Yes.

25 Q. What was that understanding?

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2           A.     Just so I could understand you  
3     you're talking specific to this -- to the  
4     school district?

5           Q.     Um-hum?

6           A.     For most part, most people felt  
7     disenfranchised.

8           Q.     Okay. Not quite what I was  
9     asking about although it's related. What I  
10    was asking if you had an opinion on the  
11    extent of the black voter participation in  
12    the political process?

13           MS. PARVIS: Objection.

14           MR. LEVINE: I haven't even  
15    gotten to the question yet.

16           Q.     So the question is: Do you have  
17    an opinion as to whether black voters  
18    participate in the political process for the  
19    school district?

20           MS. PARVIS: Objection.

21           Q.     Do you have an opinion?

22           A.     Yes, I do.

23           Q.     What is your opinion?

24           A.     My opinion is blacks in the  
25    school district feel disenfranchised in

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2 dealing with the school board elections.

3 Q. Do you have any understanding of  
4 the black voter turnout rates in the black  
5 neighborhoods in East Ramapo?

6 A. Yes, and no.

7 Q. Okay. What is your  
8 understanding?

9 A. National elections turn out the  
10 greatest amount of voter turnout. Usually  
11 local school board elections turn out  
12 minimal. There is minimal turnout in the  
13 local elections, such as the case in East  
14 Ramapo in terms of specifics. I don't know  
15 the voter percentages.

16 Q. I'm just asking for your  
17 understanding now. Do you have an  
18 understanding of why the voter turnout is  
19 minimal in school board elections?

20 A. Yes.

21 Q. What is your understanding?

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22 A. Disenfranchised.

23 Q. What do you mean by?

24 A. I'm going to speak for me. If I  
25 feel that my vote done count or it doesn't

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2 matter, I'm not going to take the time out  
3 of my day to go and vote. If I don't feel  
4 that I'm going to -- if my efforts is going  
5 to make a difference after seeing it not  
6 make a difference for so many years, the  
7 desire for me to take part in the system is  
8 going to be greatly diminished if not  
9 nothing at all.

10 Q. You voted in 2017, right?

11 A. Yes, I did.

12 Q. You voted in 2016, right?

13 A. Yes.

14 Q. And you voted in 2015, right?

15 A. I think so yes, I did.

16 Q. Just looking at your declaration  
17 you didn't vote in 2014, right?

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18 A. No.  
19 Q. But you did vote in 2013?  
20 A. Yes.  
21 Q. Do you feel disenfranchised?  
22 A. Yes.  
23 Q. Do you feel disenfranchised  
24 because the candidates that you support  
25 don't win?

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2 A. No.  
3 Q. Why do you feel disenfranchised?  
4 A. Whether or not I vote for you  
5 done mean that I don't have needs that need  
6 to be met. Certain positions if you take  
7 the position that deals with a particular  
8 sect of the population it is your obligation  
9 to do what is best for them. I feel  
10 disenfranchised because I don't feel that  
11 individuals are looking out for the best  
12 interests of the community that best  
13 reflects me.

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14 Q. Do you feel disenfranchised  
15 because you're black?

16 A. No.

17 Q. Do you think that the black  
18 community to the extent you have an  
19 understanding feels disenfranchised because  
20 of their race?

21 A. Are we speaking in terms of East  
22 Ramapo or African Americans across the  
23 board.

24 Q. Just East Ramapo.

25 A. Could you say the question

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2 again?

3 Q. Yes. I'll do it better this  
4 time.

5 Do you think -- think that black  
6 residents of East Ramapo feel  
7 disenfranchised because they're black?

8 MS. PARVIS: Objection.

9 A. I can't speak for all



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10 African-Americans I feel disenfranchised I  
11 can't speak for all black African-Americans  
12 I can only speak for me.

13 Q. Do you think that you lost your  
14 election for the school board because of  
15 your race?

16 A. No.

17 Q. Do you think that it's possible  
18 for a black man with your political views to  
19 get elected to the school board?

20 A. Yes, and no.

21 Q. We will start with yes?

22 A. Yes, this is still America we  
23 still do have an election process. No, when  
24 the deck is stacked against you when the  
25 desire to challenge or bring about change is

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2 presented many don't want it. Someone said  
3 to me once if there are ten marbles can you  
4 have two, I'm not going to give you another  
5 three so that you could be on the same plane

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6 as me I may give you one so you could have  
7 five and I could have five. The powers that  
8 be don't want to see change come about in a  
9 way that would be meaningful in the  
10 district.

11 Q. So I understand when you said  
12 the deck is stacked against you is it  
13 stacked against you in your mind because  
14 your black or because your political views  
15 means you want to change the district?

16 A. I would go in terms of changing  
17 the district.

18 Q. Let's turn back to your  
19 declaration. I actually only have a few  
20 more things. I have just a couple questions  
21 that I wanted to clear up.

22 If you look at paragraph 11 of  
23 your declaration, please, in the middle of  
24 the paragraph, I'll read so everyone could  
25 follow long, you said that your son was not

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2 one of the students issued a musical  
3 instrument, so you have had to rent a  
4 musical instrument for him at your own  
5 expense; is that right?

6 A. Yes.

7 Q. What instrument?

8 A. The clarinet.

9 Q. Do you know whether other  
10 students were able to use district-owned  
11 clarinets?

12 A. Yes.

13 Q. Were there clarinets for other  
14 students?

15 A. Yes.

16 Q. Do you know about how many  
17 clarinets were available?

18 A. No.

19 Q. Were there other instruments  
20 available?

21 A. Yes.

22 Q. Does your son still play  
23 clarinet?

24 A. Yes.

25 Q. Is your son aware that a

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2     clarinet is the coolest instrument for a  
3     students to pay in the high school band?

4             A.     No.

5             Q.     Well, you should tell him that.

6                     Have there ever been a time that  
7     you're aware where the district had more  
8     instruments available to loan to students?

9             A.     No.

10            Q.     So it's just as your son became  
11     old enough to participate in the music  
12     program, you became aware that there weren't  
13     enough musical instruments for him; is that  
14     right?

15            A.     No.

16            Q.     Are there less instruments now  
17     than there used to be?

18            A.     I can't attest to that.

19            Q.     Okay. Take a look at paragraph  
20     12. I'll just read the first sentence so  
21     people could read along. The board's recent

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22 decision to implement the use of metal  
23 detectors in public schools was a decision  
24 that other parents of public school students  
25 and I found racially insensitive. Do you

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2 see that?

3 A. Yes.

4 Q. Is that still your view as you  
5 sit here today?

6 A. Yes.

7 Q. Why do you find the decision to  
8 use metal detectors racially insensitive?

9 A. I'm an African-American male. I  
10 get stopped by the police because I drive a  
11 nice car. I get stopped by the police  
12 because I drive a nice car in a nice  
13 neighborhood. I get stopped by the police  
14 because I drive a nice car in the Bronx.  
15 Despite the fact that, again, I am a soldier  
16 in the United States Army. I have defended  
17 our nation. I am profiled on a regular

MrEricGoodwin\_Rough

18 basis. I have been stopped wearing a suit  
19 and tie. My son goes to school to learn. A  
20 metal detector in a school does not send a  
21 message of learning. It creates a level of  
22 prisons and creates that mentality, one that  
23 I feel as an African-American we are imposed  
24 on that at such a high rate. The best I  
25 could say is you see a home in a community

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2 with bars on it. Do you say that's a safe  
3 home or do you say that's a horrible  
4 neighborhood? The same would apply to metal  
5 detectors in school.

6 MR. LEVINE: I'm going to mark  
7 another document for identification as  
8 Goodwin Exhibit 3.

9 (Goodwin Exhibit # ,  
10 description, marked for  
11 identification, as of this date.)

12 Q. The document placed before you  
13 that has been marked as Goodwin Exhibit 3,

MrEricGoodwin\_Rough

14 is a newspaper article from the journal news  
15 entitled "Attempted Murder Charge in Spring  
16 Valley High School Stabbing." Do you see  
17 that?

18 A. Yes.

19 Q. You should take a look at it,  
20 but I'll describe to you that article  
21 describes an incident in the Spring Valley  
22 high school which one student stabbed  
23 another multiple times in the school. Were  
24 you aware of this incident?

25 A. Yes.

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2 Q. Do you know the young man who  
3 was stabbed?

4 A. No.

5 Q. Do you know the parents of the  
6 young man who was stabbed?

7 A. No.

8 Q. Even if you still disagree that  
9 metal detectors are racially insensitive can

MrEricGoodwin\_Rough

10 you understand why some parents might feel  
11 differently?

12 MS. PARVIS: Objection.

13 A. I can understand yes.

14 Q. Can you understand -- well,  
15 yeah. You ran for the board of education,  
16 right?

17 A. Yes.

18 Q. As a member of the board of  
19 education you hear requests from lots of  
20 parents right?

21 MS. PARVIS: Objection.

22 A. Yes.

23 Q. Sometimes parents want different  
24 things, right?

25 A. Yes.

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2 Q. Do you think that anybody on the  
3 board of education intended to be racially  
4 insensitive by implementing the medals  
5 detector policy?



MrEricGoodwin\_Rough

6 MS. PARVIS: Objection.

7 A. I don't know what their  
8 intentions were.

9 Q. Is it possible in your mind that  
10 they had good intentions for the metal  
11 detector policy even if you disagreed with  
12 it?

13 MS. PARVIS: Objection.

14 A. I would say no.

15 Q. Why would you say that?

16 A. Well, let's talk Rockland in the  
17 whole, there are some schools that have drug  
18 problems you don't see a methadone clinic in  
19 those schools there are some schools that  
20 have a plethora of different issues the  
21 minute the minute it becomes an issue of  
22 criminalization in a school of black and  
23 brown, metal detectors and things of that  
24 nature. Now this is a law firm you defend  
25 criminals I didn't see a metal detector when

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MrEricGoodwin\_Rough

2 I came into this building.

3 Q. Do you think if your son was  
4 stabbed four times in high school you would  
5 rethink that position?

6 MS. PARVIS: Objection.

7 Q. I'm just asking if you could see  
8 it from someone else's point of view?

9 A. No.

10 Q. Okay. Was your opposition to  
11 the metal detectors program ever an issue in  
12 your campaign?

13 A. Yes.

14 Q. Did you speak about it at  
15 events?

16 A. Yes.

17 Q. Do you know whether that  
18 position was popular with the voters in East  
19 Ramapo?

20 MS. PARVIS: Objection.

21 A. When I spoke about it, it got  
22 back a very positive response.

23 Q. About how many times did you  
24 speak about that particular issue if you  
25 remember?

MrEricGoodwin\_Rough

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2 A. I don't know offhand.

3 Q. Do you know whether any school  
4 in East Ramapo currently has metal  
5 detectors?

6 A. No. No.

7 Q. Do you know whether the school  
8 district ever actually implemented a program  
9 to install metal detectors?

10 A. No.

11 Q. No meaning it didn't implement a  
12 program?

13 A. No meaning I don't know if it  
14 actually implemented it.

15 Q. Do you know whether opposition  
16 to the metal detector program from the  
17 African-American community was ever  
18 communicated to the board of education?

19 A. Yes.

20 Q. How was that opposition  
21 communicated to the board of education?

MrEricGoodwin\_Rough

22           A.     There was a school board meeting  
23     in which it was presented to the general  
24     public in which it seemingly the best and  
25     the brightest students in the school were

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2     hand picked to present the arguments. They  
3     were told what the policy was, but they  
4     actually never read the policy and then when  
5     people started to ask pointed questions,  
6     that's when the -- everything went belly up.

7           Q.     I'm sorry what do you mean by  
8     belly up I don't understand?

9           A.     That's when people started to be  
10    less and less supportive of the metal  
11    detectors because they felt -- I guess some  
12    people felt -- now this is just me  
13    speaking -- that they were just being fed  
14    certain tidbits of information.

15          Q.     Would it surprise you to learn  
16    that the school district did not implement a  
17    metal detector program?

MrEricGoodwin\_Rough

18 MS. PARVIS: Objection.

19 A. I'm not surprised.

20 Q. Do you know whether Mr. Charles  
21 supported the proposed metal detector  
22 program?

23 A. I'm not sure.

24 Q. Do you know whether Mr. Germain  
25 supported the proposed metal detector

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2 program?

3 A. I'm not sure.

4 Q. Turning back to your  
5 declaration, look at page 6, paragraph 21,  
6 so everybody can follow along, I'll read it,  
7 you say "shortly after I announced my  
8 candidacy, former board member Aaron Wieder  
9 approached me to discuss my campaign in the  
10 election. Mr. Wieder informed me that I  
11 should not waste my time campaigning in the  
12 predominantly white neighbors because the  
13 white community members would never vote for

MrEricGoodwin\_Rough

14 me. Do you see that?

15 A. Yes.

16 Q. Do you recall about when this  
17 event occurred?

18 A. Yes.

19 Q. When was that?

20 A. Around February, March of 2017.

21 Q. Do you know where this occurred?

22 A. Yes.

23 Q. Where did this meeting occur?

24 A. In front of the school district,  
25 superintendent's office.

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2 Q. Were you in the superintendent's  
3 office?

4 A. No.

5 Q. Where were you?

6 A. In the parking lot speaking to  
7 the superintendent.

8 Q. Just for the record the  
9 superintendent is Dr. Deborah

MrEricGoodwin\_Rough

10 Wortham?^ spelling

11 A. Yes.

12 Q. What were you speaking to

13 Dr. Wortham about?

14 A. That is when me and Dr. Wortham  
15 were first formally introduced. We spoke to  
16 a number of poignant things. I expressed my  
17 concern, one of which was the metal  
18 detectors, school books, things of that  
19 nature. While throughout the conversation  
20 it was raining that day -- that night. Adam  
21 -- what's the name. Aaron Wieder came he  
22 knew who he was instantly.

23 Q. Who is Aaron Wieder?

24 A. He was on the school board from  
25 my understanding he's a state elected

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2 official.

3 Q. Was Aaron Wieder talking to  
4 Dr. Wortham?

5 A. I was talking to Dr. Wortham

MrEricGoodwin\_Rough

6 first, then he came into the conversation.

7 Q. Where did he come from?

8 MS. PARVIS: Objection.

9 A. I don't know.

10 Q. You were in the parking lot,

11 right?

12 A. Parking lot, yes.

13 Q. Did Mr. Wieder say why he was in

14 the parking lot?

15 A. No.

16 Q. Was there anything going on at

17 the school district that night?

18 A. Yes.

19 Q. What was going on?

20 A. There was a school board

21 meeting.

22 Q. Was Mr. Wieder at the board

23 meeting?

24 A. No.

25 Q. Did Wieder talk with Dr. Wortham

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MrEricGoodwin\_Rough

2 at all?

3 A. Yes.

4 Q. Do you recall what he said?

5 A. It was a -- not specifically.

6 Q. What is your best recollection?

7 MS. PARVIS: Objection.

8 A. Initially he identified me off  
9 the bath bat your Eric Goodwin you're  
10 running for school board yes, he introduce  
11 the himself Dr. Wortham spoke highly of him.  
12 He spoke on a number of different things.  
13 One of things he brought up was the white  
14 the flight he said the reason why the  
15 educational system in Rockland County was  
16 deteriorating was the number of blacks and  
17 Latinos coming in and number of whites much  
18 going out moving out and he said he said  
19 that that wasn't his saying that was someone  
20 else saying that to him. I think he said  
21 the person was black. He also told me about  
22 campaigning, about not going to various  
23 sections of East Ramapo and based on the  
24 current election at the time you know  
25 getting more bang for your buck the

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2 conversation was along those lines.

3 Q. Do you mind if we drill down on  
4 that a little more?

5 A. Sure.

6 Q. First a little background is  
7 Aaron Wieder black?

8 A. No.

9 Q. Is he white?

10 A. Yes.

11 Q. Do you know if he's Jewish?

12 A. Based off the way he was dressed  
13 I would assume he was Jewish.

14 Q. Because he dresses in the manner  
15 typically associated with an orthodox Jews?

16 A. Yes.

17 Q. You met Mr. Wieder before?

18 A. No.

19 Q. When he spoke with you about  
20 your campaign was he offering you advice?

21 A. Yes.

MrEricGoodwin\_Rough

22 Q. What did you mean by getting  
23 more bang for your buck?

24 A. The way I interpreted it was  
25 let's use the republican party the

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2 republican party as a whole doesn't solicit  
3 the support of African-Americans. I think  
4 he was implying the same concept, he used  
5 Hillary in saying that she only went to this  
6 state or that state, blue states versus red  
7 states for the purpose of she knew she  
8 wasn't going to get the elect to recall  
9 college she needed to win I assume he was  
10 implying the same thing in this instance.

11 Q. What was he recommending?

12 A. Basically stick in the  
13 communities that you know will vote for you.  
14 That was the way that I interpreted it.

15 Q. Did you take his advice?

16 A. Yes and no.

17 Q. Let's start with yes?

MrEricGoodwin\_Rough

18           A.     Yes, I did stick within the  
19     community well we had a grass roots  
20     operation which we did neighborhood  
21     canvassing throughout East Ramapo. No in  
22     the sense that we made a tactical decision  
23     to instead of knocking on individual doors  
24     inviting individuals to a sit down so they  
25     are their in particular needs wants concerns

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2     were addressed.

3           Q.     I was just asking for your  
4     personal take on this. Did you think -- I  
5     mean did you think Mr. Wieder was trying to  
6     be helpful?

7           MS. PARVIS: Objection.

8           Q.

9           A.     Again yes and no.

10          Q.     Let's start with yes?

11          A.     Yes, in the sense that the truth  
12     hurts. Sometimes, you know I may not like  
13     the truth, but it is what it is. No in the

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14 sense that it was the ultimate achilles heal  
15 because you couldn't heal a community if you  
16 only talked to one side. So I think it was  
17 a double edged sword.

18 Q. What do you mean in paragraph 21  
19 predominantly white neighborhoods?

20 MS. PARVIS: Objection.

21 Q. Let me ask it again. In  
22 paragraph 21, what do you mean by the phrase  
23 "predominantly white neighborhoods"?

24 A. Neighborhoods that are largely  
25 white.

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2 Q. Any particular neighborhoods?

3 A. Various neighborhoods various  
4 neighborhoods I'm not sure if he used  
5 specific neighborhoods I cannot lie I cannot  
6 remember if he used specific neighborhoods.

7 Q. Did Mr. Wieder use the phrase  
8 predominantly white neighborhoods?

9 A. No I don't think he used that

MrEricGoodwin\_Rough

10 term that phrase.

11 Q. Did you understand Mr. Wieder to  
12 be referring to orthodox and Hasidic Jewish  
13 neighborhoods?

14 A. Concerning the fact that he was  
15 Jewish, yes.

16 Q. Did you understand him to be  
17 saying that you shouldn't campaign for votes  
18 in orthodox and Hasidic Jewish neighborhoods  
19 because you're black?

20 A. No.

21 Q. What it you understand him to be  
22 saying then?

23 A. That in those neighborhoods they  
24 wouldn't vote for me because I do not  
25 support their -- not necessarily to say

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2 support, but they don't see me as supporting  
3 their beliefs.

4 Q. When you say beliefs, beliefs  
5 about what?

MrEricGoodwin\_Rough

6           A.     Various -- their particular  
7     needs concerns.

8           Q.     Like education needs is that an  
9     example?

10          A.     I just took it as needs across  
11     the board.

12          Q.     Like if this is a fair  
13     characterization tell me if it's not that's  
14     fine, but is it fair to say that Mr. Wieder  
15     was advising you not to campaign in orthodox  
16     and Hasidic Jewish neighborhoods because he  
17     didn't think they would like your political  
18     views?

19                   MS. PARVIS: Objection.

20          A.     No I don't think it was  
21     necessarily my political views.

22          Q.     What was it?

23          A.     I just think that I wasn't  
24     chosen candidate for whatever their  
25     particular wants needs and desires were.

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MrEricGoodwin\_Rough

2 Q. Well you were running for the  
3 school board, right?

4 A. Yes.

5 Q. So do you think Mr. Wieder was  
6 referring specifically to education?

7 A. No.

8 Q. Did he tell you why you should  
9 not waste your time campaigning in orthodox  
10 and Hasidic Jewish neighborhoods?

11 A. Yes, and no.

12 Q. Let's start with yes?

13 A. He gave examples to answer both  
14 questions he gave examples he use Hillary  
15 Clinton red state blue state analogy I think  
16 -- the Trump election was going on at the  
17 time that was basically how -- what he used  
18 to express.

19 Q. I get it. If this is a fair  
20 characterization tell me, Mr. Wieder  
21 analogized to partisan politics?

22 A. Yes.

23 Q. Did you agree with him?

24 A. Yes, I did.

25 Q. Have you ever spoken to



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2 Mr. Wieder again since then?

3 A. One time after yes.

4 Q. When was that?

5 A. The night of the election.

6 Q. Did you talk on the phone?

7 A. No.

8 Q. Did you talk in person?

9 A. Yes.

10 Q. Where were you?

11 A. In the superintendents -- at the  
12 school board meeting.

13 Q. Who else was there?

14 A. Everyone in Rockland County who  
15 wanted to be part of the election.

16 Q. Did you speak with Mr. Wieder  
17 directly?

18 A. Yes.

19 Q. Was it a one to one  
20 conversation?

21 A. Yes.

MrEricGoodwin\_Rough

22 Q. Were there other people involved  
23 in the conversation?

24 A. No.

25 Q. What did you talk about with

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2 them?

3 A. He wished me good luck, some  
4 pleasantries were expressed, then -- he went  
5 on his way.

6 Q. In the first conversation that  
7 you had with him the one that you described  
8 in paragraph 20, did you say anything to him  
9 in response?

10 A. Yes.

11 Q. What did you say to him?

12 A. A said a number of things. One  
13 of the things I expressed was inviting other  
14 candidates to the forum. I also expressed  
15 that I have no problems talking to  
16 individuals on both sides of all aspects  
17 within the community. I expressed

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18 displeasure in the fact that individuals are  
19 running and winning sight unseen which is  
20 not a conducive way of governing in a  
21 particular district and I think those were  
22 the -- and I addressed the issue about white  
23 flight, but it wasn't -- it was more so like  
24 I don't know how true that is or something  
25 of that nature.

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2 Q. Did he say anything in response?

3 A. Not that I recall.

4 Q. Was it a friendly interaction?

5 A. Yes.

6 Q. Did Mr. Wieder say whether or

7 not he would support your candidacy?

8 A. No he did not.

9 Q. Did you ask him to support your  
10 candidacy?

11 A. No I did not.

12 Q. Did you ask him for help with  
13 your campaign?

MrEricGoodwin\_Rough

14 A. No.

15 Q. Did he offer you help with your  
16 campaign?

17 A. No.

18 Q. If he had offered you help with  
19 your campaign would you have taken it?

20 A. Yes.

21 Q. Did you not think to ask for  
22 help?

23 MS. PARVIS: Objection am.

24 A. No, I did not.

25 Q. You did not think to ask for

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2 help; is that right?

3 A. Yes, that is correct.

4 Q. The second time you spoke with  
5 him at the school board meeting on election  
6 day, did you say anything in response to him  
7 then?

8 A. In response to what?

9 Q. So when you spoke at the board

MrEricGoodwin\_Rough

10 meeting on election day, what did he say to  
11 you?

12 A. Again pleasantries exchanged he  
13 wished me good luck, I'm not sure if he  
14 referenced the last conversation we had.  
15 After the pleasantries were extended he  
16 walked away?

17 Q. Did you say anything to him?

18 A. Yes.

19 Q. What did you say?

20 MS. PARVIS: This is my wife  
21 penny, penny this is Aaron Wieder.

22 Q. Anything else?

23 A. That was the extent of it, yes.

24 Q. Have you ever run for any other  
25 political office?

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2 A. No.

3 Q. Are you going to run for the  
4 school board again?

5 A. I'm contemplating it. We had

MrEricGoodwin\_Rough

6 a -- I'm contemplating it.

7 Q. Is there anything you would do  
8 differently if you ran for the school board  
9 again?

10 A. Yes.

11 Q. What might you do differently?

12 A. Get more people to vote for me.

13 Q. How would you go about that?

14 A. The more aggressive although we  
15 had an aggressive grass roots campaign  
16 perhaps we need to get more grass roots.

17 Q. Would you make any other efforts  
18 to reach out to the orthodox and Hasidic  
19 Jewish neighborhoods that Mr. Wieder  
20 referenced?

21 A. Yes.

22 Q. Is that how you would go about  
23 that?

24 A. You I don't know. To be honest  
25 I don't know. To give an example, I know

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MrEricGoodwin\_Rough

2 one of the candidates was offered to go to  
3 the yeshivas, but he had to comply with  
4 their mandates, and she was the white  
5 candidate, the Hispanic or myself was never  
6 offered that option.

7 Q. You do you mean Alexandra  
8 Manigo?

9 A. Manigo.

10 Q. Manigo.

11 So I guess what I mean is as you  
12 sit here today, do you know of anything  
13 specific you might do differently to try to  
14 appeal to voters in the orthodox and Hasidic  
15 Jewish communities?

16 A. Yes.

17 Q. What might that be?

18 A. Find out specifically what are  
19 their concerns, not just one or two issues,  
20 all their concerns across the board.

21 Q. Do you have any idea for how you  
22 might do that?

23 A. My grandmother used to say --  
24 yes, I do. As my grandmother used to say,  
25 ask.

MrEricGoodwin\_Rough

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2 Q. Ask Mr. Wieder?

3 A. Ask various individuals. Not  
4 just Mr. Wieder.

5 MR. LEVINE: How about we take a  
6 five minimum break I'll see if there  
7 is anything else we still need to do  
8 otherwise we will.

9 MS. MATTHEWS: I will have just  
10 a couple.

11 (Recess taken.)

12 Q. I just have a few final  
13 questions.

14 Question one: Preface without  
15 tell me about anything about any  
16 communications you may have had with your  
17 lawyers, I just want to know when did you  
18 first agree to become a plaintiff in this  
19 case?

20 A. Sometime late summer of 2017.

21 MR. LEVINE: No further



MrEricGoodwin\_Rough

22 questions.

23 EXAMINATION BY ^ HEADERS

24 MS. MATTHEWS:

25 Q. Good afternoon, Mr. Goodwin. My

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2 name is Elise Matthew. I'm from the

3 attorney general's office. I represent

4 Commissioner Elia in this lawsuit. I just

5 have a few follow-up questions.

6 Do you recall at any time making

7 any appeal or complaint to the New York

8 State education department?

9 A. No.

10 Q. What about to commissioner Elia?

11 A. No.

12 Q. What about any other employees

13 or officials at the New York State education

14 department?

15 A. No.

16 MS. MATTHEWS: That's it.

17 MR. LEVINE: That's it.

MrEricGoodwin\_Rough

18 MS. PARVIS: No further

19 questions.

20 (Time noted: ^ ^

21 ^ a.m. ^ p.m.)

22

23 WITNESS NAME

24

25 Subscribed and sworn to before me

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2 this \_\_\_ day of \_\_\_\_\_, 201\_.

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5 Notary Public

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MrEricGoodwin\_Rough

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